

# **Exhibit 27**

ELEANOR GORSKI

April 11, 2019

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF ILLINOIS  
3                   EASTERN DIVISION

4   PROTECT OUR PARKS, INC.,            )

5   CHARLOTTE ADELMAN, MARIA            )

6   VALENCIA, and JEREMIAH             )

7   JUREVIS,                             )

8                   Plaintiffs,            )

9           vs.                             ) No. 18-cv-03424

10   CHICAGO PARK DISTRICT and            )

11   CITY OF CHICAGO,                     )

12                   Defendants.             )

13           The deposition of ELEANOR GORSKI, called for  
14   examination pursuant to Notice and the Rules of  
15   Civil Procedure for the United States District  
16   Courts pertaining to the taking of depositions,  
17   taken before Elizabeth L. Vela, an Illinois  
18   Certified Shorthand Reporter, at 311 South Wacker  
19   Drive, on April 11, 2019, at the time of 1:09 p.m.  
20   (Proceedings concluded at 2:24 p.m.)

21

22

23   Reported by:   Elizabeth L. Vela, CSR

24   License No.:   084-003650

1 APPEARANCES:

2 ROTH FIORETTI, LLC, by  
3 MR. MARK ROTH and  
4 MS. TIMA RAMADANI,  
5 311 South Wacker Drive, Suite 2470  
6 Chicago, IL 60606  
7 (312) 922-6262  
8 mark@rothfioretti.com  
9 tima@rothfioretti.com  
10 Representing the Plaintiffs;

11  
12  
13 BURKE, WARREN, MacKAY & SERRITELLA, by  
14 MR. JOSEPH P. RODDY,  
15 330 North Wabash Avenue, Suite 2100  
16 Chicago, IL 60611  
17 (312) 840-7033  
18 jroddy@burkelaw.com  
19 Representing the Defendant,  
20 Chicago Park District;

21  
22  
23 MR. ANDREW W. WORSECK,  
24 CHIEF ASSISTANT CORPORATION COUNSEL  
MR. JOHN L. HENDRICKS,  
DEPUTY CORPORATION COUNSEL, and  
MR. JUSTIN TRESNOWSKI,  
ASSISTANT CORPORATION COUNSEL,  
30 North LaSalle Street, Suite 1230  
Chicago, IL 60602  
(312) 744-7129  
andrew.worseck@cityofchicago.org  
john.hendricks@cityofchicago.org  
justin.tresnowski@cityofchicago.org  
Representing the Defendant,  
City of Chicago.

## I N D E X

WITNESS EXAMINATION

ELEANOR GORSKI

BY MR. ROTH 4

## E X H I B I T S

NUMBER MARKED FOR ID

Gorski Deposition

Exhibit 1 - (30)(b)(6) Notice 4

Exhibit 2 - RFP from the University of  
Illinois at Chicago 4

Exhibit 3 - RFQ from the University of  
Illinois at Chicago 4

Exhibit 4 - Response to a Request For  
Proposal by the University of Chicago 4

Exhibit 5 - Summary Report, The Barack Obama  
Presidential Library 4

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1 (Whereupon, Gorski Deposition  
2 Exhibit 1, Exhibit 2, Exhibit 3,  
3 Exhibit 4, and Exhibit 5 were  
4 marked for identification.)

5 (Witness sworn.)

6 ELEANOR GORSKI,  
7 called as a witness herein, having been first duly  
8 sworn, was examined and testified as follows:

9 EXAMINATION

10 BY MR. ROTH:

11 Q. Can you state your name, please?

12 A. Eleanor Esser Gorski.

13 MR. WORSECK: Mark, before you go any further,  
14 I just want to put on the record that we are  
15 producing today Ms. Gorski in response to certain  
16 portions of your amended 30(b)(6) notice.

17 We've set out the details of her  
18 designation in prior correspondence and we are  
19 producing her subject to various objections we've  
20 raised to the notice, as set forth in our March 7th  
21 letter, our March 18th letter, our April 4th  
22 letter, all of this year, as well as subject to the  
23 Court's prior rulings on the scope of discovery.

24

1 BY MR. ROTH:

2 Q. Okay. These are just some documents I'm  
3 going to go through with you, so we'll get to those  
4 in a minute, but I just want to get a little bit of  
5 your background.

6 So you're with the City of Chicago,  
7 correct?

8 A. Yes.

9 Q. What's your position with the City?

10 A. I'm Bureau Chief of Planning, Design, and  
11 Sustainability and Historic Preservation with the  
12 Department of Planning and Development.

13 Q. Okay. And so can you give me a short  
14 synopsis of what that division does?

15 A. Yeah. In all those areas, we have staff  
16 that oversee those different policy areas in terms  
17 of the city.

18 And we also have some administrative  
19 functions. Our -- for example, our historic  
20 preservation staff are staff for the commission of  
21 Chicago landmarks. We also have a permit review  
22 function as it pertains to historic preservation  
23 and designated Chicagoland parks.

24 Q. How long have you been employed by the

1 City?

2 A. Since 1996.

3 Q. And how long have you been in your present  
4 position?

5 A. Four years.

6 Q. I'm going to show you what we've marked as  
7 your Exhibit No. 1. And if you could just take a  
8 look at that.

9 You understand that you've been designated  
10 to talk about a couple different topics in this  
11 case, right?

12 A. Yes.

13 Q. Okay. So in Exhibit No. 1, there's  
14 various topics, starting with 1 through 8, right?

15 A. Correct.

16 Q. And so you've been designated as a witness  
17 on Topic No. 1 and on Topic No. 6, correct?

18 A. Yes.

19 Q. So can you just tell us, what did you do  
20 to prepare for your deposition?

21 And I'm not asking any conversations you  
22 had with your lawyers, but did you review  
23 documents? What else did you do?

24 A. Yes, I reviewed the documents that were

1 supplied by our counsel that would pertain to those  
2 topics.

3 Q. Okay. Can you recall what documents more  
4 specifically that you reviewed?

5 A. Yes. Mainly, they were documents that  
6 pertained to the Plan Commission approvals that the  
7 Department of Planning and Development shepherded  
8 through.

9 So that would include the applications by  
10 the Barack Obama Foundation, the Park District, the  
11 Chicago Department of Transportation, the staff  
12 reports, the final legislative plan developments,  
13 the PowerPoint presentation that was shown to the  
14 public, and then, the legislation, the use  
15 agreement, master agreement.

16 Q. What would you say the PowerPoint  
17 presentation shown to the public -- can you be a  
18 little more specific on that?

19 A. Sure. At the Plan Commission hearing on  
20 those applications. And I believe that was May of  
21 last year.

22 Q. So you're aware that there were various  
23 sites in the city of Chicago that were proposed for  
24 the Obama Center, right?

1 MR. WORSECK: Objection. Vague.

2 BY MR. ROTH:

3 Q. You can answer.

4 MR. WORSECK: It states facts not in evidence.

5 THE WITNESS: I am aware.

6 BY MR. ROTH:

7 Q. And there were -- there was a proposal  
8 from the University of Chicago, correct?

9 A. Yes.

10 Q. And there was a proposal from UIC, right?

11 A. Yes.

12 Q. And there were a couple other proposals,  
13 as well, correct?

14 A. Yes.

15 Q. So I just want to go through some of those  
16 proposals with you and have an understanding of  
17 some of the details of that, and then, I'm going to  
18 ask you some more questions.

19 So what you have in front of you as  
20 Exhibit No. 2 is actually an RFP from the  
21 University of Illinois at Chicago. Do you see  
22 that?

23 A. Yes.

24 Q. And so for ease of reference, what I did

1 is, I put some yellow tabs on the sides here so we  
2 can just go to the --

3 A. Okay.

4 Q. -- sections that we're going to talk  
5 about, okay?

6 MR. WORSECK: Mark, just so I'm clear, this is  
7 a response from the University of Illinois at  
8 Chicago?

9 MR. ROTH: Correct.

10 BY MR. ROTH:

11 Q. Okay. So --

12 MR. WORSECK: And I'm just going to object to  
13 this document as not -- as being a document that  
14 the City did not produce in response to your  
15 discovery requests. And the scope of the  
16 deposition topics are expressly limited to  
17 documents the City produced.

18 MR. ROTH: Well, let me --

19 MR. WORSECK: So the questioning on this  
20 document would go beyond the scope.

21 MR. ROTH: Well, let me actually respond to  
22 that, because -- may I see your Exhibit No. 1?

23 The actual -- just so the record is clear,  
24 the actual Topic No. 1 talks about documents that

1     were produced and any known or related information.

2                 So I don't want to get into a -- further  
3     belabor the point, but this is certainly subject to  
4     Topic No. 1 and documents related to known  
5     information about the topics contained in Topic  
6     No. 1.    So --

7     BY MR. ROTH:

8                 Q.    All right.  So let's -- first of all, I'm  
9     going to direct your attention -- about in the  
10    middle of the document, there's a Section B.  It's  
11    the second yellow tab.

12                A.    Uh-huh.

13                Q.    Do you see that?

14                A.    Yes.

15                Q.    So if we go to the next page, which is  
16    numbered B2 -- do you see that?

17                A.    B1.2?

18                Q.    Well, I'm looking at page numbers on the  
19    bottom.

20                A.    Oh, I see.  Uh-huh.

21                Q.    So there's a Page --

22                A.    Yes.

23                Q.    -- B2 on the bottom --

24                A.    Yes.

1 Q. -- correct? So this is talking about some  
2 of the attributes of two sites that the University  
3 of Illinois at Chicago proposed for the  
4 Obama Center, correct?

5 A. Yeah.

6 MR. WORSECK: Mark, I'm just going to object  
7 here, and at the least, counsel the witness to take  
8 the time she needs to acquaint herself with the  
9 document.

10 As I said, this is not a document that the  
11 City produced. So I want to make sure that to the  
12 extent you want to persist on asking questions  
13 about this document, at the very least, the doc --  
14 the witness has a chance to look at the document.

15 MR. ROTH: Sure.

16 BY MR. ROTH:

17 Q. So why don't we do this? Why don't you  
18 take a look -- I'm going to be asking you questions  
19 about Pages B2 through B6, okay? So just take your  
20 time, take a look at those pages, and let me know  
21 after you've had a chance to review those. And we  
22 can take a break, if you'd like.

23 MR. WORSECK: We can stay on the record while  
24 the witness reviews.

1 THE WITNESS: Is there a table of contents for  
2 this document?

3 BY MR. ROTH:

4 Q. Not that I'm aware of.

5 MR. WORSECK: Also, I'm going to object to the  
6 foundation of this document. It's not clear to me  
7 as I'm sitting here that this, in fact is an RFP  
8 response from the University of Illinois at  
9 Chicago.

10 I'm not saying it's not. I just don't  
11 have a basis for agreeing with you that it is at  
12 this point.

13 THE WITNESS: That's why I was asking for the  
14 table of contents. I don't see that in the title  
15 page -- you know, there's nothing in here that  
16 indicates that.

17 It does say it's Round 2. So I'm assuming  
18 there was a Round 1. I think A3 has some sort of  
19 table of contents of who is involved in this  
20 document.

21 MR. WORSECK: While the witness is reviewing  
22 the document, I just want to note another  
23 objection; and that is, as we construe Topic 1,  
24 Topic 1, to the extent it would allow testimony on

1 alternate sites, it allows testimony on alternate  
2 sites only insofar as those sites were actually  
3 considered during the 2018 review process by the  
4 City. And the UIC proposals were not considered  
5 during the 2018 review process by the City.

6 THE WITNESS: So in the table of contents, on  
7 A3, it references an A.1 executive summary that may  
8 indicate what this document is about. And I don't  
9 appear to have an A.1 in my -- A.1 in my package.  
10 I don't know if you all have that. I don't seem to  
11 have that in mine.

12 MR. WORSECK: Yes, I have an A3. I don't have  
13 pages showing a mark for A2 or A1.

14 THE WITNESS: Okay. So I'll just review the  
15 pages you asked me to look at.

16 MR. WORSECK: Mark, can you just state again  
17 what is it that is beginning at Page B, what do the  
18 next few pages you asked the witness to look  
19 at deal with?

20 MR. ROTH: 2 through 6.

21 MR. WORSECK: But I mean, what are they dealing  
22 with?

23 MR. ROTH: They're dealing with the attributes  
24 of one of the sites that was under consideration.

1 MR. WORSECK: Which site?

2 MR. ROTH: The site proposed by UIC.

3 THE WITNESS: I'm done reviewing, if you are,  
4 yeah.

5 BY MR. ROTH:

6 Q. Did you review Pages B2 through B6?

7 A. I did.

8 Q. So I just wanted to go through some of the  
9 information contained on those pages, okay?

10 A. Uh-huh.

11 Q. So in Pages B2 through B6 of UIC's RFP,  
12 University of Illinois at Chicago was proposing two  
13 sites in that RFP, correct?

14 A. Yes.

15 MR. WORSECK: Objection. Lack of foundation.

16 BY MR. ROTH:

17 Q. And if -- as we see on Page B2, under  
18 B1.1, one of the sites was owned by the State of  
19 Illinois, correct?

20 MR. WORSECK: Same objection.

21 THE WITNESS: Should I still answer?

22 MR. WORSECK: You can answer, if you can.

23 THE WITNESS: Okay. That's what it indicates,  
24 yes.

1 BY MR. ROTH:

2 Q. And the other site is titled the North  
3 Lawndale site, right?

4 A. Yes.

5 Q. And that site was owned by the City of  
6 Chicago, correct?

7 A. That's what it states.

8 Q. Do you have any information that that is  
9 incorrect in any way?

10 MR. WORSECK: Objection. Vague. Lack of  
11 foundation.

12 THE WITNESS: I don't have any background  
13 information whatsoever on this site. So I can't  
14 say if it's correct or incorrect.

15 BY MR. ROTH:

16 Q. And if we go down to B1.3, it says that  
17 the University had done a Phase 1 environmental  
18 site analysis on that property, correct -- on its  
19 property?

20 A. On its own property, correct.

21 Q. And with respect to the North Lawndale  
22 property, as of this time of the RFP, the City did  
23 not have what's referred to there as an NFR letter.  
24 Do you see that?

1 A. Yes. That's what it indicates.

2 Q. And NFR, I assume means no further  
3 remediation?

4 A. I would think so.

5 Q. Did the City ever perform any  
6 environmental analysis of the North Lawndale site?

7 MR. WORSECK: Objection. Lack of foundation.  
8 And again, all of the questions as to this document  
9 are outside the scope.

10 THE WITNESS: I have no knowledge of that.

11 BY MR. ROTH:

12 Q. Did the City ever provide any estimate of  
13 costs for any environmental remediation necessary  
14 at the North Lawndale site?

15 A. I have no knowledge of that.

16 Q. If we look down a little further on that  
17 Page B2, under B1.5, it says circulation and  
18 traffic study. Do you see that?

19 A. Yes.

20 Q. Did the City ever perform any analysis of  
21 any alterations that would be necessary to the  
22 streets or roads as a result of accommodating the  
23 Obama Center at the North Lawndale location?

24 A. I'm not aware or have any knowledge of it.

1 Q. Did the City ever perform any analysis of  
2 any road or street alterations that would be  
3 necessary to accommodate the Obama Center at the  
4 University of Illinois site?

5 A. Again, I'm not aware if that occurred.

6 Q. Did the City perform any analysis of the  
7 costs of any potential street or road alterations  
8 as a result of locating the Obama Center at either  
9 the UIC site or the North Lawndale site?

10 A. That is something that I'm not aware of.

11 Q. Now, if we go to Page B4 -- do you see  
12 that?

13 A. Yes.

14 Q. Under the heading parking assessment,  
15 there's a subheading for the University of Illinois  
16 at Chicago. Do you see that?

17 A. Yes.

18 Q. And this RFP states that there were 5,000  
19 parking spaces available at University of Illinois  
20 at Chicago, correct?

21 A. That's what it states, yes.

22 Q. And with respect to the North Lawndale  
23 site, it describes it as a 23-acre site, correct?

24 A. Yes.

1 Q. And it says that there is space that  
2 exists on that 23-acre site to develop new parking  
3 facilities, correct?

4 A. It does say that.

5 Q. Now, if we look at Page B5, the  
6 North Lawndale site is described as consisting of  
7 approximately 940,000 square feet, correct?

8 A. Yes.

9 Q. And the UIC site is described as having  
10 278,000 square feet, right?

11 A. Yes.

12 Q. Let's take a look at Page B6. This  
13 document states under the heading conveyance of  
14 ownership that the University of Illinois was  
15 willing to either enter into a long-term lease for  
16 the Obama Center or actually transfer its property  
17 to the Obama Foundation, correct?

18 A. Yes.

19 Q. And with respect to the North Lawndale  
20 site, the City would be in support of a conveyance  
21 of that property that the City owned to the  
22 Foundation, correct?

23 A. That's what this states.

24 MR. WORSECK: Objection to the extent the

1 document speaks for itself and you're just asking  
2 the witness to state what's in the document.

3 BY MR. ROTH:

4 Q. Do you have any reason to doubt that the  
5 City would not have supported a conveyance of the  
6 North Lawndale site to the Foundation?

7 MR. WORSECK: Objection. It calls for  
8 speculation.

9 THE WITNESS: I have no knowledge either way.

10 BY MR. ROTH:

11 Q. Did the City have any analysis done to  
12 determine the fair market value of the  
13 North Lawndale site?

14 A. Again, I have no knowledge of that.

15 Q. Did the City have any analysis done to  
16 determine the fair market lease value of the  
17 North Lawndale site?

18 A. I don't know. I have no knowledge of it.

19 Q. If we go a little further down the page,  
20 we see a Section B.3. Do you see that?

21 A. I do.

22 Q. And under the heading of the  
23 North Lawndale site, it indicates that that site  
24 was a former industrial site, correct?

1 A. Yes, it does.

2 Q. And so the North Lawndale site was not a  
3 park, right?

4 A. According to this document, they're saying  
5 it was a former industrial site. I don't know what  
6 it is now.

7 Q. As of the time of this document, the RFP  
8 which is December 2014, was the North Lawndale site  
9 a park?

10 A. I can't speak to that. I have no  
11 knowledge.

12 Q. So you don't know if it's a park right  
13 now, right?

14 A. Correct.

15 Q. And you don't know if it was ever a park?

16 A. That's right.

17 Q. Now, according to this RFP, there was no  
18 historic, archeological, or ecological features  
19 that are sensitive or would be impacted by  
20 construction of the Obama Center, right?

21 A. That's what this states.

22 Q. Do you have any --

23 MR. WORSECK: Mark, can you just direct me to  
24 where you're looking at?

1 THE WITNESS: Right here.

2 MR. WORSECK: I see.

3 BY MR. ROTH:

4 Q. Do you have any information that the  
5 North Lawndale site was a historic landmark site?

6 A. I have no knowledge of that.

7 Q. If we go to Page 3 of Exhibit No. 1 -- so  
8 flip all the way forward.

9 A. To the beginning?

10 Q. Yes, please.

11 A. Okay.

12 Q. The University of Illinois sites that they  
13 were proposing were consistent with  
14 Daniel Burnham's 1909 Plan for Chicago, correct?

15 MR. WORSECK: Objection. The document speaks  
16 for itself. You're asking the witness to  
17 characterize a document that she has not seen  
18 before.

19 THE WITNESS: I'm reading this.

20 BY MR. ROTH:

21 Q. Yes.

22 A. I see Burnham's name here, but I don't  
23 know what they're saying.

24 MR. WORSECK: Mark, while the witness is

1 reviewing the document, can you direct me to  
2 where -- under your theory that any known related  
3 information is fair game under Topic 1, where in  
4 documents produced by the City --

5 MR. ROTH: First of all.

6 MR. WORSECK: -- those documents were  
7 addressing information that this --

8 MR. ROTH: Certainly.

9 MR. WORSECK: -- Exhibit 2 purportedly --

10 MR. ROTH: Yeah. So first of all --

11 MR. WORSECK: -- would be relevant to.

12 MR. ROTH: Let me address that while you're  
13 reading it.

14 First of all, the topic is not confined to  
15 documents produced by the City. It's confined by  
16 documents produced in discovery, number one, and  
17 any known or related information, number two. So  
18 that's what Topic No. 1, which was ordered by the  
19 Judge, consists of.

20 The Obama Foundation, as we'll see in this  
21 case, produced studies that show each particular  
22 site that was listed in the city of Chicago that  
23 they considered.

24 These particular sites that we're talking

1 about are listed in those documents. This is known  
2 related information that relates to those documents  
3 that the Foundation produced. This is on the  
4 Foundation's website. It's one of the sites that  
5 was absolutely considered and it's covered by Topic  
6 No. 1.

7 MR. WORSECK: So which party produced Exhibit  
8 No. 2 in discovery?

9 MR. ROTH: I don't know if any party produced  
10 Exhibit No. 2. I know it's been referred to, but  
11 I'd have to take a look at where it's at.

12 The Obama Foundation produced documents,  
13 which we'll be seeing, that ranked all of the  
14 locations in the city. There were several, much  
15 more than I'm going to question the witness about  
16 here today.

17 And these documents relate to the  
18 documents that were produced by the Foundation.  
19 And the topic is not related to documents produced  
20 by the City. It's related to documents produced in  
21 the litigation in discovery, which the  
22 Obama Foundation unquestionably did, and any known  
23 or related information.

24 MR. WORSECK: So just so I'm clear, you're not

1 aware of any party having produced Exhibit No. 2 in  
2 discovery and your argument for why Exhibit No. 2,  
3 nonetheless, is within the scope of Topic 1 is that  
4 the Obama Foundation, a third party, produced  
5 documents in its discovery that teed up this  
6 particular set of issues raised by Exhibit No. 2?

7 MR. ROTH: I think it's -- first of all, it's  
8 relevant because it says that -- it talks about  
9 documents produced in response to plaintiff's  
10 discovery request. The Obama Foundation produced  
11 documents in response to plaintiff's discovery  
12 request.

13 MR. WORSECK: I understand your reading of the  
14 scope. I just want to know what documents you're  
15 basing it on. And based on what you said, it  
16 sounds like you're basing it on the Obama  
17 Foundation's documents.

18 And as we set forth in our objections, we  
19 object to testimony to the extent there would be  
20 testimony about non-City documents; i.e.,  
21 third-party documents.

22 MR. ROTH: Well that's your objection.

23 MR. WORSECK: Right.

24 MR. ROTH: So you've made your objection, and

1 I'm sure, at some point in time, the Judge will  
2 rule on the objection.

3 MR. WORSECK: Well, you never contested that  
4 objection. When you filed your motion for relief  
5 in front of the Court, you did not raise --

6 MR. ROTH: I don't have to --

7 MR. WORSECK: -- our construal of the topics as  
8 relating only to City-produced documents as a  
9 problem that the plaintiffs had any issue with.

10 MR. ROTH: Okay. So what I'd like to do is get  
11 along with the deposition.

12 MR. WORSECK: Sure. I just want to make all of  
13 this clear on the record.

14 MR. ROTH: Okay. It's all clear.

15 THE WITNESS: Would you mind restating your  
16 question?

17 BY MR. ROTH:

18 Q. I will restate my question. According to  
19 the RFP, Exhibit No. 1 that you have in front of  
20 you, the UIC proposal was consistent with  
21 Daniel Burnham's 1909 Plan of Chicago, is that --  
22 would that be correct?

23 A. I don't interpret it that way, if I may.  
24 The sentence says Daniel Burnham's 1909 Plan of

1 Chicago offered a westward vision of an integrated  
2 city radiating its rational planning model from the  
3 proposed Civic Center at Congress and Halsted, in  
4 parens, our academic site, to the city's western  
5 limit, parens, just beyond our North Lawndale site.  
6 That's a pretty broad statement.

7 Q. So is there anything from the City's  
8 perspective that was inconsistent with UIC's  
9 proposal and Daniel Burnham's 1909 Plan of Chicago?

10 MR. WORSECK: Objection. Outside the scope.  
11 Lack of foundation.

12 THE WITNESS: There's a lot in Daniel Burnham's  
13 plan. And I would have to review that in careful  
14 consideration with this document, which I've not  
15 done. So I'm afraid I can't answer that.

16 BY MR. ROTH:

17 Q. Okay. So you don't have an opinion?

18 A. Correct.

19 Q. Let's take a look at the next document,  
20 your Exhibit No. 2. I'm sorry. It's Exhibit 3,  
21 actually.

22 A. Okay.

23 Q. So I'm going to -- so you have in front of  
24 you what is actually an RFQ from the University of

1 Illinois at Chicago. I'm going to direct your  
2 attention --

3 MR. WORSECK: Mark, I just want to state  
4 objections -- I don't want to cut you off once you  
5 wind up and get into your question, but I will  
6 state the same set of objections as to this  
7 document as I was stating as to Exhibit 2.

8 It appears to be a document that was not  
9 produced by any party in discovery. If I'm wrong  
10 about that, please let me know who produced this.  
11 And for the reasons I've stated with respect to  
12 Exhibit 2, we view this as outside the scope of the  
13 deposition.

14 BY MR. ROTH:

15 Q. I'm going to be asking you questions about  
16 Pages 130 through 134. So if you want to just take  
17 a moment to read through those, I would appreciate  
18 it.

19 A. Just so I'm clear, this is the response to  
20 an RFQ, and then, the first -- Exhibit 2 is the  
21 second round that gave more detail?

22 Q. Correct.

23 A. This is the same process or --

24 Q. Yes. The RFQ that you have in front of

1     you, Exhibit 3 --

2           A.     Exhibit 3.

3           Q.     -- is June of 2014.

4           A.     Okay.

5           Q.     The RFP that you saw before in Exhibit 2  
6     is December of 2014.

7           A.     I see. Okay. So this was done first --

8           Q.     Correct.

9           A.     -- the one I'm looking at? All right. So  
10    130, you said, to 134?

11          Q.     Correct.

12          MR. WORSECK: I also just want to note for the  
13    record that the exhibits being handed to the  
14    witness, as well as counsel or on the table have  
15    various yellow post-it notes attached to certain  
16    pages, apparently to help direct the reader's  
17    attention to pertinent pages that counsel wishes to  
18    focus on, and I would ask that those post-it notes  
19    be retained as part of the official exhibits with  
20    the record of the deposition.

21          THE WITNESS: And I'd like a magnifying glass  
22    for this page because --

23    BY MR. ROTH:

24          Q.     It's tough, I know.

1           A.     There are three pages on one page.     So I  
2     will try my best --

3           Q.     Okay.   Thank you.

4           A.     -- to review this.

5           Q.     I appreciate that.

6           A.     Okay.   So I've skimmed this.

7           Q.     Okay.   I'm just going to ask you a couple  
8     questions about it.

9           A.     Yeah.

10          Q.     So if we take a look at Pages 130 through  
11     132, that lists actually three sites, correct?

12          A.     That's what it indicates, yes.

13          Q.     Okay.   So you see a community site, a  
14     medical site, and an academic site, right?

15          A.     Right.

16          Q.     Now, I want to focus, first of all, on the  
17     community site.   So that goes on Page 130 to  
18     apparently Page 133.

19          A.     Yes.

20          Q.     First of all, if we look on Page 133,  
21     under community site, it talks about utilities.   Do  
22     you see that?

23          A.     Yes.

24          Q.     And this RFQ indicates that the site was

1 already connected to existing sewer, water,  
2 electrical, and gas utilities, right?

3 A. Yes.

4 Q. And under existing zoning, the zoning was  
5 M2. Do you see that?

6 A. That's what it indicates, yes.

7 Q. And that's light industry district,  
8 correct?

9 A. Yes.

10 Q. Okay. So that would indicate that at  
11 least as of the time that this RFQ was put out that  
12 the community site was not a park, correct?

13 A. Not necessarily.

14 Q. What is the zoning for a park?

15 A. There has been an effort by the City to  
16 rezone parks as we get to them. That should be  
17 POS. And there are some cases where the parks have  
18 not been rezoned to the new zoning classification  
19 and they still retain their old classification.

20 Q. Okay. So let me ask you a very direct  
21 question.

22 A. Yes.

23 Q. The community site that's shown here both  
24 in the RFQ and the RFP at the University of

1 Illinois at Chicago, is that a park?

2 A. This information does not indicate that  
3 it's a park.

4 Q. Now, if we take a look at the academic  
5 site on Page 134 -- do you see that?

6 A. Yes.

7 Q. That indicates under utilities that storm  
8 water, city water, natural gas, and redundant high  
9 voltage underground electrical distribution were  
10 available at that academic site, right?

11 A. Yes.

12 Q. And do you have any information that the  
13 academic site was a park or is a park?

14 A. You know, I'm sorry, I need to amend my  
15 last answer.

16 This isn't even like a complete thought  
17 under utilities. It just lists utilities. It  
18 doesn't even say if they're actually connected to  
19 the site.

20 So I want to be precise here. As opposed  
21 to the last site, where it actually stated there  
22 were connections on -- visible on-site, this does  
23 not.

24 Q. Okay. Do you know --

1 MR. WORSECK: And again, I just want to make  
2 clear on the record that, you know, the document,  
3 whatever it is, speaks for itself. You're asking  
4 the witness to respond to your characterizations of  
5 the document on the fly.

6 She can answer the questions, but I'm  
7 going to object to the extent that you're asking  
8 her to agree with certain characterizations that  
9 you're offering as to a document that speaks for  
10 itself.

11 MR. HENDRICKS: And which she has not reviewed  
12 previously.

13 MR. WORSECK: Right.

14 BY MR. ROTH:

15 Q. Do you know if the academic site at the  
16 time of this RFQ had water and natural gas and  
17 underground distribution --

18 A. No.

19 Q. -- to the site? You have no knowledge?

20 A. I have no knowledge of this site.

21 Q. Let's take a look at Exhibit No. 4. You  
22 have that in front of you, right?

23 A. Yes. Uh-huh.

24 Q. Have you seen this document before?

1 MR. WORSECK: Mark, can you just give me a  
2 second to catch up?

3 MR. ROTH: Okay.

4 THE WITNESS: I've not seen this document  
5 before.

6 BY MR. ROTH:

7 Q. This document is a response to a request  
8 for proposal by the University of Chicago. Do you  
9 see that on the first page?

10 A. I do.

11 Q. Now --

12 MR. WORSECK: Mark, before you get into your  
13 questions on the document, I'm going to reassert  
14 the same objections as to the prior two exhibits.

15 It looks like based on the Bates stamp  
16 here that this was produced by the Foundation, but  
17 it was not produced by the City. And so for that  
18 reason, it's outside the scope.

19 BY MR. ROTH:

20 Q. Okay. Let's take a look on Page 13 of  
21 that document.

22 Under this response to an RFP, University  
23 of Chicago was suggesting three potential sites for  
24 the Obama Center, would that be correct?

1           A.     I'm sorry. I'm reading what Page 13 is  
2     stating here.

3           MR. WORSECK: While the witness is looking, I  
4     just want to amend the objection I just stated.

5                     I believe I said the document was not  
6     produced by the City. I meant to say the document  
7     was not generated by the City. It's not a City  
8     document. It's a University of Chicago document.

9           THE WITNESS: So Page 13 does state that this  
10    section outlines three sites that could support an  
11    accessible and engaged Presidential Center in the  
12    narrative. That was your question, right? Is that  
13    what this is showing, yes.

14    BY MR. ROTH:

15           Q.     Yes. So the three sites that the  
16    University of Chicago was suggesting as candidates  
17    for the Obama Center were the South Shore site,  
18    what's described as the Woodlawn site, right?

19           A.     Yes.

20           Q.     And also, the Washington Park site,  
21    correct?

22           A.     That is what is shown in this map.

23           Q.     Okay. And when we see the Woodlawn site,  
24    that's actually Jackson Park, isn't it?

1 A. Yes.

2 Q. Did the City perform any analysis of the  
3 benefits and detriments to the City of Chicago  
4 regarding locating the Obama Center at the South  
5 Shore site?

6 MR. WORSECK: Objection. Vague.

7 THE WITNESS: Are you asking in reference to  
8 this document, if there's something in here, or --

9 BY MR. ROTH:

10 Q. No. No. Let me repeat -- let me repeat  
11 the question. I'm not referencing this document --

12 A. Okay.

13 Q. -- that you see in front of you. I'm  
14 asking you a general question.

15 Did the City perform any analysis of the  
16 benefits and detriments to the City of Chicago  
17 regarding locating the Obama Center at the South  
18 Shore site?

19 MR. WORSECK: And I'm going to object as  
20 outside the scope to the extent the question is not  
21 rooted in a document produced by the City, nor is  
22 it -- nor does it pertain to the 2018 review  
23 process engaged in by the City.

24 THE WITNESS: I'm not aware of an analysis if

1 it occurred.

2 BY MR. ROTH:

3 Q. Did the City of Chicago have any analysis  
4 performed of the benefits and detriments to  
5 residents of the state of Illinois regarding  
6 locating the Obama Center at the South Shore site?

7 MR. WORSECK: Same objection.

8 THE WITNESS: I am not aware if that analysis  
9 occurred.

10 BY MR. ROTH:

11 Q. So one of the sites mentioned in here is  
12 the Washington Park site, correct?

13 A. Yes.

14 Q. And by here, again, I'm referring to  
15 Exhibit 4, correct?

16 A. And page 13.

17 Q. Yes. So let's take a look a little  
18 further into Exhibit No. 4. And I'm looking  
19 specifically at what's been marked as Page 16 of  
20 that document. And the Bates stamp on that is 595,  
21 which is in the lower right-hand corner. Do you  
22 see that?

23 A. 594?

24 Q. 595.

1 MS. RAMADANI: It's the second post-it. It  
2 should be, I believe.

3 THE WITNESS: Oh. Page 16. Sorry.

4 BY MR. ROTH:

5 Q. Yeah. Is there a post-it there?

6 MR. WORSECK: There are actually two Page 16s.

7 THE WITNESS: Yeah, there are two.

8 MR. WORSECK: They have different Bates stamps.

9 BY MR. ROTH:

10 Q. Okay. So let me start over so we have a  
11 good frame of reference here.

12 A. Okay.

13 Q. I'm looking at Exhibit 4, the page that is  
14 Bates stamped 595. Do you see that?

15 A. Yes. Okay.

16 Q. So the Washington Park site in the upper  
17 right-hand corner is described as consisting of  
18 34.2 acres, correct?

19 A. That is what the document indicates, yes.

20 Q. And there's a box drawn at the bottom of  
21 the page that has the title Washington Park. Do  
22 you see that at the bottom right-hand corner?

23 A. Yes.

24 Q. And as the site is described here, the

1 site consists of a part of Washington Park, itself,  
2 correct?

3 A. That's what's indicated, but there's  
4 also -- it appears to be a parcel of land outside  
5 the park --

6 Q. Right.

7 A. -- as part of it.

8 Q. Okay. So I want to just clarify that.  
9 What's described here with respect to the  
10 Washington Park site includes a part of  
11 Washington Park, itself, correct?

12 A. That's what's indicated in the map, yes.

13 Q. And then, there's another separate parcel  
14 that is outside of the park, right?

15 A. It appears that way, yes.

16 Q. So let's take a look now at what has been  
17 Bates stamped University Page 616.

18 And why don't you just take a moment, if  
19 you would, please, to read that page to yourself  
20 and let me know when you're done.

21 A. Okay.

22 Q. Now, in the first sentence of the second  
23 paragraph, the University of Chicago concluded that  
24 the Washington Park site pairs the greatest need

1 with the greatest opportunity. That's what it  
2 says, right?

3 A. That's what it's stating, yes.

4 Q. And in the last paragraph of this same  
5 page, it states that placing the Obama Center in  
6 this site provides an opportunity for the  
7 Foundation to develop the Presidential Center  
8 without occupying Park District land, correct?

9 A. That's what the last sentence states.

10 Q. Well, let's take a look at the next page,  
11 which is University 617.

12 Now, if we take a look at Subsection 4  
13 entitled plan for land assembly, including  
14 anticipated cost for preparing the site for  
15 development -- do you see that?

16 A. Yes.

17 Q. And it indicates that the land that's not  
18 part of the Park District land contains a filling  
19 station and an auto garage, correct?

20 A. Yes.

21 Q. And University of Chicago anticipated that  
22 there would be costs of about \$220,000 to remediate  
23 that property, right?

24 A. I'd like a minute to read this.

1 Q. Oh, I'm sorry.

2 A. Yeah.

3 Q. Of course.

4 MR. WORSECK: Take your time.

5 THE WITNESS: Okay.

6 BY MR. ROTH:

7 Q. So just to back up a little bit --

8 A. Yeah.

9 Q. -- with respect to the Washington Park  
10 site, we're talking about the portion of the  
11 proposed site that was not Park District land,  
12 correct? Do you understand that?

13 A. I do, but I'm seeing if that is really  
14 clear here, because you know, I'm relying on what's  
15 written here.

16 So the Washington Park site includes both  
17 the parcel in the park, as well as the parking --  
18 or as well as the parcels on Garfield Boulevard,  
19 but they don't distinguish between the two when  
20 they talk about environmental remediation. So you  
21 have to infer that so --

22 Q. Okay. Well, let me ask you this.

23 A. Yeah.

24 Q. Is there a filling station and auto garage

1 located on the Wash -- on the property that  
2 consists of Washington Park?

3 MR. WORSECK: Objection. Foundation.

4 THE WITNESS: No. And they do state that the  
5 filling station and auto garage is on East Garfield  
6 Boulevard --

7 BY MR. ROTH:

8 Q. Okay. So --

9 A. -- in this document.

10 Q. Right. So the filling station and auto  
11 garage are on the part of the Washington Park site  
12 that does not consist of Park District land,  
13 correct?

14 A. That's what they're indicating, yes.

15 Q. Okay. And the University of Chicago  
16 indicated that their estimate to clean up those --  
17 that site that's not part of the park would be  
18 about \$220,000, correct?

19 MR. WORSECK: Objection. The document speaks  
20 for itself.

21 THE WITNESS: So they do state that to remove  
22 the gas tanks and the demolition. They then state  
23 in the next paragraph that remediation of the  
24 contaminated soil is not part of that estimate is

1 what I infer from this.

2 BY MR. ROTH:

3 Q. Okay.

4 A. Yeah.

5 Q. And this is not -- obviously, removing the  
6 remediated soil and demolishing the filling station  
7 and the auto garage is all work that's not  
8 happening on the Park District-owned land, correct?

9 A. That's what they're indicating here.

10 Q. Okay. Let's go to the next page. Did  
11 this -- let me ask you this.

12 Did the City ever perform any analysis of  
13 any changes in the roads or streets that would be  
14 necessary to accommodate the Obama Center at the  
15 Washington Park location that was suggested by the  
16 University of Chicago?

17 MR. WORSECK: Same objections as raised before  
18 as outside the scope.

19 THE WITNESS: So I am not aware if any of those  
20 studies were done.

21 BY MR. ROTH:

22 Q. Did the City perform any analysis of the  
23 costs of any road or street alterations that would  
24 need to be accomplished in order to locate the

1 Obama Center at the Washington Park location that  
2 was offered by the University of Chicago?

3 MR. WORSECK: Objection. Outside the scope.

4 THE WITNESS: Could I have a minute and ask you  
5 a question?

6 BY MR. ROTH:

7 Q. Well, can you answer my question --

8 A. Oh.

9 Q. -- and then, you can certainly talk to  
10 Andrew.

11 A. Okay. Not that I'm aware.

12 MR. ROTH: Do you want to talk?

13 MR. WORSECK: Do you want to take a break?

14 THE WITNESS: Yeah. Do you mind?

15 MR. ROTH: You can go outside, yeah. That's  
16 fine. Yeah.

17 (A short break was taken.)

18 BY MR. ROTH:

19 Q. Now, the portion of the land that's not in  
20 Washington Park in this proposal by the University  
21 of Chicago, that land that's not in the park, to  
22 the best of your knowledge, was not a historic  
23 landmark property, correct?

24 MR. WORSECK: Objection. Lack of foundation.

1 It mischaracterizes prior testimony.

2 THE WITNESS: Based on Page 57 and how they  
3 describe the sites, they state that they're vacant.  
4 So that typically would not indicate there would be  
5 any historic landmark --

6 BY MR. ROTH:

7 Q. With --

8 A. -- designation. Oh, I'm sorry.

9 Q. No, go ahead.

10 A. Except this is located on  
11 Garfield Boulevard. And the boulevard system has  
12 been placed on the national register. So even if  
13 they haven't stated it, it is.

14 Q. So is the land that the filling station --  
15 I'm sorry.

16 The land that the filling station and the  
17 auto garage were located on that's described in  
18 this response to the request for proposal, you're  
19 saying that that's somehow historic property?

20 A. The entire boulevard and park system for  
21 the City of Chicago, of which Garfield Boulevard is  
22 a part of, and the parcels on either side are  
23 considered part of that system.

24 So yes, it would be included as part of

1 that national register nomination or district,  
2 though that's not stated in the document here.  
3 That's my personal knowledge.

4 Q. So the zoning for that parcel, as we see  
5 on Page 57 of Exhibit 4, was RS-3 zoning, correct?

6 A. You are looking at 4 on Page 55 or where  
7 are you?

8 Q. I'm looking at Page 57 --

9 A. Okay.

10 Q. -- which is Bates stamped University 618.

11 A. Right.

12 Q. Do you see that?

13 A. Uh-huh.

14 Q. And under Roman Numeral X -- do you see  
15 that, the bottom right-hand corner?

16 A. Yes. Uh-huh. RS-3.

17 Q. Yes.

18 A. Uh-huh.

19 Q. Okay. So the zoning for the parcel that  
20 was not in the park is RS-3?

21 A. Uh-huh. That's what this states, yes.

22 Q. Did the City of Chicago perform any  
23 analysis as to the fair market value of the  
24 property described in this Washington Park location

1 that was not on the parkland?

2 MR. WORSECK: Objection. Outside the scope.

3 THE WITNESS: Not that I have knowledge of.

4 BY MR. ROTH:

5 Q. Did the City perform any analysis of the  
6 fair market rental value of that property?

7 MR. WORSECK: Same objection.

8 THE WITNESS: Not that I have knowledge of.

9 BY MR. ROTH:

10 Q. Did the City perform any analysis of any  
11 alterations to the public transportation system  
12 that would be necessary to accommodate the  
13 Obama Center at the Washington Park location?

14 MR. WORSECK: Objection. Outside the scope.  
15 Vague.

16 THE WITNESS: Not that I'm personally aware of.

17 BY MR. ROTH:

18 Q. Did the City perform any analysis of any  
19 costs to the residents of the City of Chicago to  
20 alter any public transportation facilities to  
21 accommodate the Obama Center at the Washington Park  
22 location?

23 MR. WORSECK: Objection. Outside the scope.

24 THE WITNESS: Not that I'm aware of.

1 BY MR. ROTH:

2 Q. Okay. Let's take a look at the next  
3 exhibit, which is Exhibit 5.

4 A. Uh-huh.

5 Q. This is a document entitled Summary  
6 Report, The Barack Obama Presidential Library. Do  
7 you see that?

8 A. Yes.

9 Q. And if we --

10 MR. WORSECK: Mark, before you get rolling  
11 again, I just want to note for the record the same  
12 objections I raised before as to documents that  
13 were not produced by the City or City-generated  
14 documents.

15 BY MR. ROTH:

16 Q. If we take --

17 MR. WORSECK: Those materials are outside the  
18 scope of the deposition.

19 BY MR. ROTH:

20 Q. If we take a look at the page that's Bates  
21 stamped Obama Foundation 2210 -- can you turn to  
22 that, please?

23 A. Yes.

24 Q. So --

1 MR. WORSECK: Can you give me a second, Mark?

2 2210? Okay.

3 BY MR. ROTH:

4 Q. So this page that you're looking at, and  
5 then, the page that follows, 2211, describe  
6 14 locations that were under consideration for the  
7 Obama Presidential Center. Do you see that?

8 A. Yes.

9 Q. And some of those locations were in the  
10 city of Chicago, right?

11 A. Yes.

12 Q. So for example, we see on Bates stamped  
13 Page 2210 that there was a proposal by the  
14 Bronzeville Investment Alliance. Do you see that?

15 A. Yes.

16 Q. And there was a proposal by Chicago  
17 Lakeside Development, right?

18 A. Yes.

19 Q. And then, Chicago State University had  
20 Option A and Option B that they proposed, right?

21 A. You know, can -- I'm sorry. If I could  
22 ask a question. I have not seen this document  
23 before, and I'm, in my mind, trying to understand  
24 the chronology.

1           You're asking if these are suggested  
2   sites, but there was an RFQ, and then, a follow-up  
3   response to an RFP. In which order did this  
4   document -- was this generated, I guess,  
5   chronologically?

6           Q. Well, we would have to look at the dates,  
7   but this is August of 2014.

8           A. And then --

9           Q. So --

10          A. -- these were done after, is that right?

11          Q. Before and after.

12          A. Okay. So the RFQ was done first, then --

13          MR. WORSECK: Just for the record, the witness  
14   was pointing to the stack of previous exhibits when  
15   she asked these were done after.

16          THE WITNESS: And I'm just asking to be precise  
17   to answer your questions, because you're asking me  
18   if these are proposed sites. So I would like to  
19   know, are these sites that were done in the first  
20   tranche of RFQ responses or RFP?

21   BY MR. ROTH:

22          Q. I don't know that answer.

23          A. Okay. All right. So I'll try to answer  
24   as best as I can --

1 Q. Please do.

2 A. -- even though I'm not -- yeah.

3 Q. So this document that you're looking at,  
4 though, which is Exhibit 5 --

5 A. Yes.

6 Q. -- lists at least two options that Chicago  
7 State University proposed, correct?

8 A. I'm sorry. I'm a little uneasy saying  
9 they proposed it. Can I just read this first  
10 page --

11 Q. Of course.

12 A. -- to see what this document is a summary  
13 of?

14 Okay. So Page 5, I think, answers the  
15 questions I was asking. Do you mind restating the  
16 question?

17 Q. The University -- I'm sorry. Chicago  
18 State University had -- lists an Option A and an  
19 Option B in Exhibit No. 5, correct?

20 A. Uh-huh.

21 Q. You have to say yes or no.

22 A. Yes. Sorry. Yes.

23 Q. And if we take a look at the next page  
24 Bates stamped 2211, here, we see proposals by UIC

1 and also University of Chicago, correct?

2 A. Yes.

3 Q. Now, I want to direct your attention to  
4 the next two pages Bates stamped 2212 and 2213. Do  
5 you see that?

6 A. Yes.

7 Q. Now, these two pages provide what's  
8 entitled a summary of responses, correct?

9 A. Yes.

10 Q. And it lists each site and some attributes  
11 about the particular sites --

12 A. Yes.

13 Q. -- would that be fair to say?

14 A. Uh-huh.

15 Q. And then, if we take a look at Page 2213,  
16 we see that the University of Illinois at Chicago  
17 sites are listed and the University of Chicago  
18 sites are listed, correct?

19 A. Yes.

20 Q. In looking at the University of Illinois  
21 at Chicago sites, the score that the  
22 Obama Foundation gave those sites was 120 out of a  
23 possible 150 down at the bottom of the page,  
24 correct?

1           A.     The University of Illinois at Chicago,  
2     right?

3           Q.     Right.

4           A.     Yes.   Uh-huh.

5           Q.     And the Foundation ranked that third best  
6     out of 11 particular sites, correct?

7           A.     That's what it indicates, yes.

8           Q.     And with respect to the University of  
9     Chicago sites, we see that Washington Park is  
10    listed there, correct?

11          A.     Yes.

12          Q.     And that received a score of 122 out of  
13    150, right?

14          A.     Yes.

15          Q.     And that was ranked first by the  
16    Foundation, correct?

17          A.     Yes.

18          Q.     And then, we also see next to that is the  
19    Woodlawn site, correct?

20          A.     Yes.

21          Q.     And --

22          A.     I'm sorry.   I just want -- this is --  
23    these ratings were done by the Foundation.   I'm  
24    sorry if I'm being too precise here, but I don't

1 want to -- I don't want to give the wrong answer.

2 Okay. It says Foundation members and our  
3 advisors assess each respondent and proposed site.  
4 So yes, that would be accurate that the Foundation  
5 ranked these. Go ahead. I'm sorry.

6 Q. So the Woodlawn site was listed as second  
7 out of 11, correct?

8 A. Yes.

9 Q. Okay. Woodlawn being Jackson Park, right?

10 A. Yes.

11 Q. So in this summary report by the  
12 Foundation, the Foundation listed the top three  
13 locations for the Obama Center as all being in  
14 Chicago, would that be fair to say?

15 A. I'm sorry. What -- what was the last  
16 part?

17 (Whereupon, the record was read.)

18 THE WITNESS: Yes. Uh-huh.

19 BY MR. ROTH:

20 Q. So you had Washington Park number one,  
21 Jackson Park number two, and the UIC sites as  
22 number three in this report, right?

23 A. Yes, though I have a question for you.  
24 Each one of these ranks, it looks like it has an

1     asterisk next to it and I don't see what the  
2     asterisk indicates.

3             Do you see that down at the bottom or is  
4     that just a graphic thing?

5     Q.     I didn't make the document. I have no  
6     idea.

7     A.     All right. Well, again, I'm just saying  
8     that as an aside. I'm not sure if that has further  
9     information.

10    Q.     Okay. But at least from what you're  
11    seeing on Page 2213 --

12    A.     Yes.

13    Q.     -- the top three sites were unquestionably  
14    in Chicago, right?

15    A.     Yes.

16    Q.     All right. So now, there -- I assume that  
17    the Obama Center being located in Chicago provides  
18    certain benefits, right?

19    A.     To Chicago, yes.

20    Q.     Okay. Are there certain categories of  
21    benefits that locating the Obama Center in Chicago  
22    would provide?

23    A.     Are you referencing this document again?

24    Q.     No.

1           A.     Okay.

2           Q.     We're actually done with the documents.

3           A.     Okay.

4           Q.     So what are the categories of benefits  
5     that the City of Chicago would receive by having  
6     the Obama Center in the city?

7           A.     In the PD staff report that was done to  
8     review the proposal made by the Barack Obama  
9     Foundation and looking at that site, the benefits  
10    were outlined as transportation improvements, park  
11    improvements.

12                   Bringing in a world class institution to  
13    Chicago would certainly have spill-over economic  
14    benefits.

15          Q.     Well --

16          A.     And increased recreational opportunities,  
17    yeah.

18          Q.     I guess I tried to think of what the  
19    benefits would be of having the Obama Center in the  
20    city of Chicago. And this is what I came up with.  
21    And you tell me if I'm on the right track or I'm  
22    completely off base here.

23                   One would be that there would be a benefit  
24    to the City because you're building something in

1 the city and that would allow people to be employed  
2 to construct a building, right? That would be a  
3 benefit?

4 A. That always is with construction, yes.

5 Q. And a second benefit would be that there  
6 would be hopefully increased tourism to the city,  
7 right?

8 A. Absolutely, yes.

9 Q. And then, a third benefit would be  
10 development of the surrounding area or kind of a  
11 community development, right?

12 A. You would hope so, yes.

13 Q. And then, there's an educational  
14 component, which would be a benefit of having it in  
15 the city; and that is, you could educate people  
16 about the president -- the former president and his  
17 initiatives and service, right?

18 A. Yes.

19 Q. So the locations that were being  
20 considered for the Obama Center, in any of those  
21 locations that we talked about, a building or  
22 buildings would have been constructed, correct?

23 A. Yes.

24 Q. Did the City perform any analysis of the

1 economic benefits to the City as a result of having  
2 the Obama Center built on any particular location?

3 A. Not that I'm aware of.

4 Q. Did the City perform any analysis of the  
5 economic benefits of any increased tourism as a  
6 result of having the Obama Center at any one  
7 location as opposed to a different location?

8 A. The City did not perform that.

9 Q. Did the City perform any analysis of any  
10 community development benefits to the City as a  
11 result of building the Obama Center in one location  
12 versus other potential locations?

13 A. Not that I'm aware of.

14 Q. Did the City perform any analysis as to  
15 any educational benefits to the City of Chicago or  
16 its residents as a result of locating the  
17 Obama Center in one particular location as opposed  
18 to another location?

19 A. No, I'm not aware of any.

20 Q. Did the City, itself, ever perform any  
21 study analyzing benefits to the City of the various  
22 sites that were proposed for the Obama Center?

23 A. Not that I'm aware of.

24 Q. I'm assuming there are detriments to the

1 City to have the Obama Center, is that correct?

2 MR. WORSECK: Objection. Vague.

3 THE WITNESS: In terms of a construction  
4 project, there's always issues that need to be  
5 mitigated, and with the Obama Center in any of  
6 these locations, I do see, you know, possible  
7 issues, environmental, utilities, kind of the  
8 issues that you went through in the beginning, the  
9 traffic. Those are all things that would need to  
10 be solved for any site.

11 So I guess you could call those  
12 detriments, but hopefully, would be solved through  
13 the design process.

14 BY MR. ROTH:

15 Q. Did the City ever perform any study or  
16 analysis of the detriments to the city's residents  
17 of having the site at one location versus another  
18 proposed location?

19 A. Not that I'm aware of.

20 Q. Did the City, itself, ever perform any  
21 analysis as to whether it was in the best -- strike  
22 that.

23 Did the City ever perform any analysis as  
24 to comparing the sites that were up for

1 consideration and whether each site was the best  
2 site from the City of Chicago's perspective?

3 A. Up for consideration from who -- to whom?  
4 Who was considering --

5 Q. Let's just talk about the sites that we  
6 talked about today, the University of Illinois at  
7 Chicago and University of Chicago.

8 A. So being considered by the Barack Obama  
9 Foundation?

10 Q. Correct.

11 A. You're asking if the City was part of that  
12 evaluation process?

13 Q. No. I'm asking, did the City, itself,  
14 perform any study that from the City's perspective,  
15 one location was more beneficial than another  
16 location?

17 A. Not that I'm aware of.

18 Q. Did the City perform any analysis that  
19 locating the Obama Center on public parkland would  
20 provide any greater benefit than locating it on  
21 non-parkland?

22 A. No.

23 MR. ROTH: Let me just take a break. I might  
24 be done. Just give me five minutes.

1 (A short break was taken.)

2 MR. ROTH: I have no further questions.

3 MR. WORSECK: And we have no questions. I just  
4 want to state for the record that none of the  
5 exhibits used with the witness today were documents  
6 generated by the City.

7 Only one of them had been even produced by  
8 the City. And even that document, which was --  
9 well, a version of Exhibit 4, itself, had been  
10 generated by a third party.

11 MR. ROTH: Okay. What do you want to do with  
12 signature?

13 MR. WORSECK: We'll reserve.

14 (FURTHER DEPONENT SAITH NOT)

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1 STATE OF ILLINOIS )

2 ) SS:

3 COUNTY OF C O O K )

4 I, Elizabeth L. Vela, an Illinois Certified  
5 Shorthand Reporter, do hereby certify that  
6 heretofore, to-wit, on the 11th day of April, 2019,  
7 personally appeared before me, at 311 South Wacker  
8 Drive, Chicago, Illinois, ELEANOR GORSKI, in a  
9 cause now pending and undetermined in the United  
10 States District Court, wherein PROTECT OUR PARKS,  
11 INC., et al. are the Plaintiffs, and CHICAGO PARK  
12 DISTRICT, et al. are the Defendants.

13 I further certify that the said witness was  
14 first duly sworn to testify the truth, the whole  
15 truth and nothing but the truth in the cause  
16 aforesaid; that the testimony then given by said  
17 witness was reported stenographically by me in the  
18 presence of the said witness, and afterwards  
19 reduced to typewriting by Computer-Aided  
20 Transcription, and the foregoing is a true and  
21 correct transcript of the testimony so given by  
22 said witness as aforesaid.

23 I further certify that the signature to the  
24 foregoing deposition was reserved by counsel for

1 the respective parties.

2 I further certify that the taking of this  
3 deposition was pursuant to Notice, and that there  
4 were present at the deposition the attorneys  
5 hereinbefore mentioned.

6 I further certify that I am not counsel for nor  
7 in any way related to the parties to this suit, nor  
8 am I in any way interested in the outcome thereof.

9 IN TESTIMONY WHEREOF: I have hereunto set my  
10 hand this 18th day of April, 2019.

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Elizabeth L. Vela

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April 11, 2019

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1 U.S. Legal Support Job No. 793759

2 -----

3 DEPOSITION OF ELEANOR GORSKI, 04/11/2019

4 -----

5 CASE NAME: PROTECT OUR PARKS, INC., et al. vs.

6 CHICAGO PARK DISTRICT, et al.

7 -----

8 I, Eleanor Gorski, being first duly  
9 sworn, on oath, say that I am the witness in the  
10 aforesaid statement, that I have read the  
11 foregoing transcript of my deposition taken at the  
12 aforesaid time and place and that the foregoing is  
13 a true and correct transcript of my testimony so  
14 given.

15 \_\_\_\_\_ Corrections have been submitted

16 \_\_\_\_\_ No corrections have been submitted

17

18 \_\_\_\_\_

19 ELEANOR GORSKI

20 SUBSCRIBED AND SWORN TO

21 before me this \_\_\_\_\_ day

22 of \_\_\_\_\_ A.D., 201\_.

23 \_\_\_\_\_

24 Notary Public

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23 \_\_\_\_\_ Date: \_\_\_\_\_

24 ELEANOR GORSKI

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